REMARKS

In the April 14, 2005 Office Action, the Examiner noted that claims 1-5 and 7-15 were pending in the application and were rejected under 35 USC § 103. In rejecting the claims, U.S. Patents 6,335,729 to Nunokawa et al. and 6,512,497 to Kondo et al. (References B and C, respectively, in the April 14, 2005 Office Action) were cited. Claims 1-5 and 7-15 remain in the case. The Examiner's rejections are traversed below.

While the cited references are similar to the present invention in that all are directed to the display of images or text, there are significant differences. The system disclosed by Nunokawa et al. is a navigation system for an automobile and has an object of displaying "a map ... based on information read from a recording medium after a short reading time ... [from] activation of the apparatus" (column 3, lines 26-28). As illustrated in Fig. 3 and described in columns 5 and 6, when power is turned off (step 109) "the map data for generating the map display screen currently displayed on the display 15 (... [which] is stored in the image data memory 17) is transferred to and stored in the data saving memory 18" (column 6, lines 21-24). When the system is turned on, "the map screen data saved in the memory 18 is read out ... and ... supplied to the display 15" (column 5, lines 48-51). In other words, Nunokawa et al. simply discloses saving a copy of the image that was previously displayed in data storage memory 18, so that the image can be quickly redisplayed when the system is turned back on without the time required to obtain the image from the disk. Thus, in contrast to the present invention, Nunokawa et al. teaches against relying on "display information for indicating a display state" (e.g., claim 1, lines 9-10) written in a "non-volatile storage unit" (e.g., claim 1, line 10) and subsequently "reading the display information from said non-volatile storage unit when power is switched on" (claim 2, lines 2-3), so that "the image display unit displays the image based on the display information" (claim 2, last two lines). As discussed in response to previous rejections, the present invention is not directed to saving the image data itself, but rather information regarding how the image is displayed. This significantly reduces the amount of information required to be stored and is useful for more than quickly displaying a previously displayed image, as discussed below.

The display device disclosed by <u>Kondo et al.</u> is used to display "an electronic book, that displays contents stored in a recording medium" (Abstract, lines 1-2) on two screens positioned side by side, like the pages on an open book (see Fig. 14(a). The energy required for such a display can be reduced by operating in a one-screen mode as illustrated in Fig. 14(b). As described at column 5, lines 20-39, the display mode (one-screen or two-screen) and page

number(s) displayed upon power-off are stored, so that the same page(s) are displayed in the same mode when the apparatus is turned back on.

It is submitted that adding the display state storage information of Kondo et al. to the teachings of Nunokawa et al. would not result in any change, or would defeat the objective of Nunokawa et al. Even if display state information, such as the portion of the map previously displayed by the system disclosed in Nunokawa et al., is stored, what will be displayed upon start-up will be the image data stored in data storage memory 18, so that a map is quickly displayed. The whole purpose of the system taught Nunokawa et al. is to display image data quickly or continuously (see the description of Fig. 5 in column 7), instead of waiting for the data to be read. Thus, Nunokawa et al. teaches against storing only display state information as taught by Kondo et al.

For the above reasons, it is submitted that the claims patentably distinguish over <u>Nunokawa et al.</u> and Kondo et al. for the reasons discussed in the March 15, 2005 Amendment with regard to previously cited prior art.

Furthermore, the independent claims have been amended to clarify that the display state information is not stored for only a single image, or the equivalent of a single "bookmark" as taught by Kondo et al., but rather for "a plurality of images" (e.g., claim 1, lines 1-2) where the "currently displayed image ... correspond[s] ... to one of the plurality of images" (claim 1, lines 10-11). As described in the specification with reference to Fig. 5, "display information ... about the latest display state of the page of each image data ... in the image storage unit ... is stored" (page 18, lines 8-11). This is recited in claim 11 as "a non-volatile storage unit storing data corresponding to the images" (claim 11, line 3) with similar limitations in claims 12 and 13. All of the independent claims now recite a limitation similar to "writing display state information indicating the display state of the currently displayed image corresponding to one of the images in the non-volatile storage unit if the display state information is not already stored in the non-volatile storage unit" (claim 15, last three lines).

The claimed invention provides several benefits that are not suggested by either Nunokawa et al. or Kondo et al. First, each of a plurality of images that were previously displayed can be displayed with the same characteristics, e.g., "display size' ... [and] 'display position'" (Application, page 18, line 12-13) with which they were previously displayed. No suggestion of providing an ability to store multiple bookmarks or control how information is displayed, such as using enlarged characters for the equivalent of a "large-print book," has been found in Kondo et al. The system disclosed by Nunokawa et al. describes what happens when

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changing discs, e.g., for the purpose of displaying more detail (see column 7, lines 24-26). Since Nunokawa et al. is directed to a navigation system, contrary to attempting to display information from a disc in the same way that it was displayed the last time the disc was accessed, "[o]nce the display of a map is thus activated, a process of updating a determined current position is carried out ... and [w]hen the displayed range of the map must be scrolled as a result of the movement of the position, the map data for the relevant area is read from the map disc ... and the relevant map is displayed on the display" (column 6, lines 1-9). Thus, with respect to this feature, also, Nunokawa et al. teaches away from the present invention.

For the above reasons, it is submitted that the independent claims and claims 2-10 which depend from claim 1, patentably distinguish over <u>Nunokawa et al.</u> and <u>Kondo et al.</u>

Summary

It is submitted that the references cited by the Examiner, taken individually or in combination, do not teach or suggest the features of the present claimed invention. Thus, it is submitted that claims 1-5 and 7-15 are in a condition suitable for allowance. Reconsideration of the claims and an early Notice of Allowance are earnestly solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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